REMARKS

This is intended as a full and complete response to the Final Office Action dated April 5, 2006. In view of the amendments and the following discussion, the Applicants believe that all claims are in allowable form.

CLAIM OBJECTIONS

Claim 12 has been objected due to informalities. The Applicants have cancelled claim 12 thus rendering the objection moot.

CLAIM REJECTIONS

35 U.S.C. §103 Claims 1-4, 6-7, 10-19, 20-22 and 26-31

Claims 1- 4, 6-7, 10-19, 20-22 and 26-31 stand rejected as being unpatentable over United States Patent No. 5,415,729 issued May 16, 1995 to *Strasser, et al.* (hereinafter referred to as *"Strasser"*) in view of United States Patent No. 5,755,888 issued May 26, 1998 to *Torii, et al.* (hereinafter referred to as *"Torii"*). In response, the Applicants have amended claims 1, 21 and 27 and cancelled claims 12-20. The Applicants reserve the right to file continuing applications to further prosecute the cancelled subject matter.

Independent claims 1, and 21 recite elements not taught or suggested by the combination of *Strasser* and *Torii*. *Strasser,* in the embodiment of Figures 4A-C cited by the Examiner, teaches using a longitudinal section in which a transporting system 16 is disposed. The transporting system 16 has partitions 13 coupled thereto, that may be selectively sealed against the longitudinal section by inflatable seals 5, thereby forming chamber like recipients between the partitions 13. The partitions are coupled to the transporting system 16, not the longitudinal section. The chamber like recipients (*i.e.,* the processing regions defined between the partitions) move with the transporting system 16 relative to the longitudinal section. Since the processing regions move through the longitudinal section, access to chamber like recipients (*i.e.,* processing regions) are made at the ends of the longitudinal section. It is unnecessary, and would eliminate the need for the inventive seals of *Stasser*, to provide access ports formed through the longitudinal section to enable access to the processing regions. Additionally, as the processing region defined between the partitions moves with the transporting system 16 relative to the longitudinal section, *Strasser* could not provide first and second process regions defined in a chamber body and bound by an interior sidewall, an outer sidewall, and a bottom of the chamber body, wherein each process region has a single substrate transfer port formed through the outer sidewall of the chamber body, as recited by claim 1, and a chamber body having a bottom member and an interior wall extended from the bottom member, and first and second annular processing regions defined in the chamber body and bound by the interior wall and the bottom member, as recited by claim 21. Therefore, *Strasser* does not teach or suggest the claimed elements recited by claims 1 and 21.

Torii teaches connecting two separate different process chambers, *e.g.*, a PVD chamber and a MOCVD chamber, through a connecting part 10 for each processing region. A substrate support assembly and a gas distribution assembly may be disposed in the separate chambers to facilitate a deposition process.

The Examiner asserts that one skilled in the art would be motivated to modify the apparatus of *Strasser* with the internal components, *e.g.*, support assembly and gas distribution assembly, of *Torii* to perform semiconductor processing etch in processing region simultaneously. The Applicants respectfully disagree as *Torii* does not teach or suggest a modification to *Strasser* that bridges the significant gap in the teachings of *Strasser* discussed above.

The Applicants submit that there is no motivation to incorporate the substrate support and/or gas distribution assembly of *Torii* into the chamber like recipients 13 of *Strasser* in a manner that would yield the claimed invention. If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. MPEP 2143.01; *In re Ratti*, 270 F.2d 810 (CCPA 1959). Particularly, there cannot be a suggestion to modify *Strasser* by any reference to include first and second process regions defined in a chamber body and bound by an interior sidewall, an outer sidewall, and a bottom of the chamber body, or a chamber body having a bottom member and an interior wall extended from the bottom member, and first and second annular processing regions defined in the chamber body and bound by the interior wall and the bottom member, as recited by claims 1 and 21.

Therefore, the Applicants submit that independent claims 1 and 21, and all claims depending therefrom, are patentable over the combination of *Strasser* and *Torii.* Accordingly, the Applicants respectfully request the rejection be withdrawn and the claims allowed.

35 U.S.C. §103(a) Claims 1, 21, 29 and 31

Claims 1, 8 and 21 stand rejected as being unpatentable over *Strasser* in view of United State Patent Publication 2002/0195056, published to *Sandhu et al.* (hereinafter referred to as "*Sandhu*"). The Applicants respectfully disagree.

Independent claims 1 and 21 recite elements not taught or suggested by the combination of *Strasser* and *Sandhu.* The teaching of *Strasser* has been discussed above. *Sandhu* teaches a reactor chamber having multiple deposition regions to deposit individual monolayer on a substrate in each deposition region. Each process region has a substrate support and a gas supply source disposed therein. However, *Sandhu* does teach or suggest a modification to *Strasser* that would yield a chamber body having bottom, outer and interior sidewalls, first and second process regions defined in the chamber body and bound by the interior sidewall, the outer sidewall, and bottom, a single substrate transfer port formed through the outer sidewall of the chamber body, as recited by claim 1, or a chamber body having a bottom member and an interior wall extended from the bottom member, first and second annular processing regions defined in the chamber body and bound by the interior wall and the bottom member, a substrate support member positioned in each of the first and second processing regions, as recited by claim 21. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the elements.

Therefore, the Applicants submit that independent claims 1 and 21, and claims 29 and 31 depending therefrom, are patentable over the combination of *Strasser* and *Sandhu.* Accordingly, the Applicants respectfully request the rejection be withdrawn and the claims allowed.

35 U.S.C. §103(a) Claim 23

Claim 23 stands rejected as being unpatentable over *Strasser* in view of *Torri* and further in view of United State Patent No. 5,501,739, issued March 26, 1996, to *Yamada, et al.* (hereinafter referred to as "*Yamada*"). The Applicants respectfully disagree.

Independent claim 21 recites elements not taught or suggested by the combination of *Strasser, Torri* and *Yamada*. The teachings of *Strasser* and *Torri* have been discussed above. *Yamada* teaches a gas distribution plate having a plurality of apertures to dispense gas supplied therefrom. However, *Yamada* does not teach or suggest a modification to *Strasser* and *Torri* that would yield a chamber body having a bottom member and an interior wall extended from the bottom member, first and second annular processing regions defined in the chamber body and bound by the interior wall and the bottom member, and a first gas distribution assembly positioned above a bottom member and defining an upper boundary of a first annular processing region, and a second gas distribution assembly positioned above the bottom member and defining an upper boundary of a second annular processing region, as recited by claim 21. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the elements.

Therefore, the Applicants submit that claim 23, depending from independent claim 21, is patentable over the combination of *Strasser, Torri* and *Yamada*. Accordingly, the Applicants respectfully request the rejection be withdrawn and the claims allowed.

35 U.S.C. §103(a) Claims 5 and 24-25

Claims 5 and 24-25 stand rejected as being unpatentable over *Strasser* in view of *Torri* and further in view of United State Patent No. 6,017,396, issued January 25, 2000, to *Okamoto, et al.* (hereinafter referred to as "*Okamoto*"). The Applicants respectfully disagree.

Independent claims 1 and 21 recite elements not taught or suggested by the combination of *Strasser, Torri* and *Okamoto*. The teachings of *Strasser* and *Torri* have been discussed above. *Okamoto* teaches using a vacuum opening on a bottom of a process chamber to exhaust process gases. However, *Okamoto* does not teach or suggest a modification to *Strasser* and *Torri* that would yield a chamber body having a bottom, an outer sidewall and an interior sidewall, first and second process regions defined in the chamber body and bound by the interior sidewall, the outer sidewall , and the bottom, a single substrate transfer port formed through the outer sidewall of the chamber body, as recited by claim 1, or a chamber body having a bottom member and an interior wall extended from the bottom member, first and second annular processing regions defined in the chamber body and bound by the interior wall and the bottom member, a substrate support member positioned in each of the first and second processing regions, as recited by claim 21. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the elements.

Therefore, the Applicants submit that claims 5 and 24-25, depending from independent claims 1 and 21, are patentable over the combination of *Strasser, Torri* and *Yamada*. Accordingly, the Applicants respectfully request the rejection be withdrawn and the claims allowed.

35 U.S.C. §103(a) Claim 9

Claim 9 stands rejected as being unpatentable over *Strasser* in view of *Torri* and further in view of United State Patent No. 5,976,259, issued November 2, 1999, to *Yamazaki, et al.* (hereinafter referred to as "*Yamazaki*"). The Applicants respectfully disagree.

Independent claim 1 recites elements not taught or suggested by the combination of *Strasser, Torri* and *Yamazaki*. The teachings of *Strasser* and *Torri* have been discussed above. *Yamazaki* teaches coating a liner on a chamber wall to protect the chamber from damage. However, *Yamazaki* does not teach or suggest a modification to *Strasser* and *Torri* that would yield a chamber body having a bottom, an outer sidewall and an interior sidewall, first and second process regions defined in the chamber body and bound by the interior sidewall, the outer sidewall, and the bottom, a single substrate transfer port formed through the outer sidewall of the chamber body, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the elements.

Therefore, the Applicants submit that claim 9, depending from independent claim 1, is patentable over the combination of *Strasser, Torri* and *Yamazaki*. Accordingly, the Applicants respectfully request the rejection be withdrawn and the claims allowed.

CONCLUSION

Applicants submit that all claims are in condition for allowance. Accordingly, the Applicants respectfully request reconsideration of this application and its early allowance.

If the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Mr. Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

June 7, 2006

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